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11 *Counsel for Lead Plaintiffs*

12 [Additional Counsel on Signature Page]

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 OAKLAND DIVISION

16 WILLARD A. SHARRETTE, DAVID
17 GOLDMAN, and ESTA GOLDMAN,
18 Individually and on Behalf of All Others
19 Similarly Situated,

20 Plaintiffs,

21 v.

22 CREDIT SUISSE INTERNATIONAL, a
23 foreign company, CREDIT SUISSE
24 SECURITIES (USA) LLC, a Delaware
25 limited liability company, and DOES 1-100,

26 Defendants.

Case No. 4:13-cv-02783-SBA

**STIPULATION, DECLARATION, AND
ORDER TO CONTINUE ORAL
ARGUMENT AND CASE
MANAGEMENT CONFERENCE**

Date: July 24, 2014
Time: 3:00 p.m.
Judge: Hon. Sandra Brown
Armstrong
Courtroom: 1, 4th Floor

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28 STIPULATION, DECLARATION, AND ~~PROPOSED~~ ORDER TO CONTINUE ORAL ARGUMENT
AND CASE MANAGEMENT CONFERENCE

4:13-cv-02783-SBA

1 WHEREAS, pursuant to stipulation of the parties and the Court's Order on December 24,
2 2013 (ECF No. 46), the initial case management conference was continued to July 24, 2014 at
3 3:00 pm;

4 WHEREAS, on February 3, 2014, Lead Plaintiffs filed a Consolidated Amended
5 Complaint (ECF No. 48);

6 WHEREAS, Defendants Credit Suisse International and Credit Suisse Securities (USA)
7 LLC ("Defendants") filed a Motion to Dismiss the Consolidated Amended Complaint ("Motion
8 to Dismiss") on April 4, 2014 (ECF No. 53), and the hearing for the Motion to Dismiss is set for
9 September 9, 2014 (ECF No. 62);

10 WHEREAS, as detailed in the accompanying Declaration of Thomas Laughlin, counsel
11 for Lead Plaintiffs, a conflict has arisen with respect to the September 9, 2014 hearing date for
12 the Motion to Dismiss in that the Ninth Circuit has scheduled oral argument in another case for
13 that date; and

14 WHEREAS, the parties agree that the interests of judicial economy and efficiency would
15 best be served by postponing the case management conference until after the hearing on the
16 Motion to Dismiss;

17 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by all parties through
18 their respective counsel of record, that:

- 19 1. The oral argument in this matter currently scheduled for September 9, 2014 be
20 continued to September 16, 2014, at 1:00 p.m., or another date that is convenient
21 for the Court.
- 22 2. The case management conference in this matter currently scheduled for July 24,
23 2014 be continued to September 24, 2014, at 3:00 pm, or another date that is
24 convenient for the Court and which post-dates oral argument.
- 25 3. All other deadlines set forth in the Court's Order Setting Initial Case Management
26 Conference and ADR Deadlines be continued accordingly.

1 IT IS SO STIPULATED.

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3
4 DATED: July 9, 2014

Respectfully submitted,

SCOTT+SCOTT, Attorneys at Law, LLP

5 By: /s/ Thomas L. Laughlin IV
6 Thomas L. Laughlin IV
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18 *Counsel for Lead Plaintiffs*

19 DATE: July 9, 2014

LATHAM & WATKINS LLP

20 By: /s/ Allison S. Davidson
21 Allison S. Davidson (267964)
22 Patrick E. Gibbs (183174)
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26 *Counsel for Credit Suisse International and Credit*
27 *Suisse Securities (USA) LLC*

Pursuant to Local Rule 6-2, this Stipulation is supported by the following Declaration of Thomas Laughlin.

DECLARATION OF THOMAS LAUGHLIN

I, Thomas Laughlin, declare:

1. I am an attorney at Scott+Scott, Attorneys at Law, LLP, counsel for Plaintiffs in this action. I have the principal responsibility for arguing on behalf of Lead Plaintiffs at oral argument regarding Defendants' Motion to Dismiss. I make this Declaration in support of the parties' stipulation to continue the oral argument and case management conference scheduled in this action.

2. The parties have stipulated to these continuances at my request.

3. Oral argument in this matter is presently scheduled for September 9, 2014.

4. On July 3, 2014, the United States Court of Appeals for the Ninth Circuit scheduled oral argument on September 9, 2014 in *Saginaw Police & Fire Pension v. Andreessen*, No. 12-16473. I am the attorney arguing that appeal. I cannot ask the Ninth Circuit to reschedule that hearing date as I have already done so once, when the oral argument was initially scheduled during a trial pending in the United States District Court for the District of Maine, in *Bankers' Bank Northeast v. Berry Dunn McNeil & Parker*, No. 12-cv-127.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on July 9, 2014 at New York, New York.

/s/ Thomas L. Laughlin, IV
Thomas L. Laughlin, IV

PURSUANT TO THIS STIPULATION IT IS SO ORDERED.

DATED: 7/10/2014


HON. SANDRA BROWN ARMSTRONG
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2014, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of July, 2014 at New York, New York.

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